

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

JOHN J. VAUGHN, GERALD A.
KALBFLEISCH, MICHAEL HATHAWAY, and
MYRTLE HATHAWAY,

Plaintiffs,

v.

PUTNAM INVESTMENT MANAGEMENT,
LLC and PUTNAM RETAIL MANAGEMENT
LIMITED PARTNERSHIP

Defendants.

Civil Action No. 06-11438 (GAO)
and Civil Action No. 04-10988 (GAO)

PLAINTIFFS' MOTION TO CONSOLIDATE

Plaintiffs move under Rule 42(a) of the Federal Rules of Civil Procedure for an order consolidating for discovery and trial the action captioned Vaughn, et al. v. Putnam Investment Management, LLC et al., No. 04-CV-10988 (GAO) (herein the "2004 Action") with the virtually identical newly-filed action captioned Vaughn, et al. v. Putnam Investment Management, LLC et al., No. 06-CV-11438 (GAO) (herein the "2006 Action").

The grounds for this Motion are set forth in the accompanying Memorandum of Law.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), Plaintiffs respectfully request a hearing on the within motion.

Dated: September 12, 2006

Respectfully submitted,

/s/ Lisa A. Furnald

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I, Lisa A. Furnald, hereby certify that I conferred with opposing counsel in a good faith effort to resolve or narrow the issues presented by this motion.

/s/ Lisa A. Furnald

CERTIFICATE OF SERVICE

I, Lisa A. Furnald, hereby certify that on September 12, 2006, a true copy of Plaintiffs' Motion To Consolidate was served electronically through the ECF System and by first class mail, postage prepaid, to those counsel of record indicated as non-registered ECF participants.

/s/ Lisa A. Furnald

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